

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THERESA WALLS

v.

ERIC CHEVALIER, ATLAS LEASING
COMPANY and TAK TRUCKING INC.

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NO.

NOTICE OF REMOVAL

TO: The United States District Court
for the Eastern District of Pennsylvania

Defendants, Eric Chevalier, Atlas SN Leasing Inc. and TAK Trucking Inc., by and through their attorneys, Yost & Tretta, LLP, hereby file the within Notice of Removal of the above-captioned matter from the Philadelphia County Court of Common Pleas in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and in support thereof, aver as follows:

1. This action was commenced by Complaint filed in the Philadelphia County Court of Common Pleas, July Term, 2017, No. 02318. A copy of the Complaint is attached hereto, made a part hereof, and marked as Exhibit "A."

2. On or about July 31, 2017, plaintiff's Complaint was served upon defendant, TAK Trucking Inc.

3. At all times relevant to this action, plaintiff was an adult individual and citizen of the Commonwealth of Pennsylvania,

residing at 305 Sharon Avenue, Apt. A, Sharon Hill, Delaware County, Pennsylvania. See Exhibit "A."

4. At all times relevant to this action, defendant, Eric Chevalier, was an adult individual and a citizen of the state of Louisiana, residing at 504 Park Street, New Iberia, Louisiana.

5. At all times relevant to this action, defendant, TAK Trucking Inc., was an Illinois corporation with its principal place of business located at 2510 Devon Avenue, Elk Grove, IL 60007.

6. At all times relevant to this action, defendant, Atlas SN Leasing Inc., was an Illinois corporation with its principal office located at 2500 East Devon Avenue, Elk Grove Village, IL 60007.

7. Thus, complete diversity of citizenship exists among the parties.

8. The value of the matter in controversy, as appearing from the allegations contained in the Complaint, exceeds the amount of \$75,000.00, exclusive of interest and costs.

9. Accordingly, because diversity of citizenship exists and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs, original jurisdiction exists in the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. Sec. 1332.

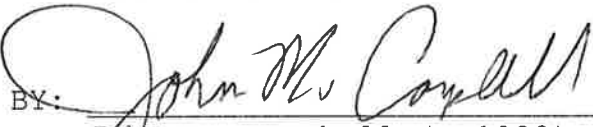
10. Copies of all process, pleadings and Orders which have been received by the defendants are filed herewith.

11. This Notice is timely, having been filed within thirty (30) days of service upon the defendant, TAK Trucking Inc., with a copy of the Complaint filed by the plaintiff by which this action was commenced.

WHEREFORE, notice is given that this action is removed from the Philadelphia County Court of Common Pleas to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

YOST & TRETTE LLP

BY: 
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